

EXHIBIT A

interrogatory to the extent that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

22. How did defendant Nick Smith get Plaintiffs personal cell phone number, and incorrect home address 20 minutes after Plaintiff left Sandy Beach Park on August 5th, 2022. Who provided this information to Nick Smith, and under what law, rule, policy, or procedure were they authorized to provide this personal information stored electronically in the Newaygo County 911 database. Please provide all documents related to this process.

ANSWER: Defendants object to this interrogatory to the extent that these interrogatories exceed the number permitted under FRCP 33 (including all discrete subparts) without leave of the Court, that it asks for a legal conclusion, and that it requests documents outside of a Request for Production pursuant to FRCP 34. Without waiving such objections, Defendants respond as follows: Director Smith was provided this information verbally by law enforcement on the scene for the sole purpose of contacting Lane Myers to advised that he was being trespassed from the County Parks. By way of further answer, Plaintiff has no expectation of privacy for this information.

23. How did Deputies Freriks and Kalinowski acquire Plaintiffs personal cell phone number, and incorrect home address 20 minutes after Plaintiff left Sandy Beach Park on August 5th, 2022. Who provided this information to Deputies Freriks and Kalinowski, and under what law, rule, policy, or procedure were they authorized to

provide this personal information stored electronically in the Newaygo County 911 database. Please provide all documents related to this process.

ANSWER: Defendants object to this interrogatory to the extent that these interrogatories exceed the number permitted under FRCP 33 (including all discrete subparts) without leave of the Court, that it asks for information from individuals, such as Deputy Kalinowski, who are not parties to this case, that it asks for a legal conclusion, and that it requests documents outside of a Request for Production pursuant to FRCP 34. Without waiving such objections, Defendants respond as follows: Records Management System – Lane Myers was in the system based on previous encounters with the NCSO. By way of further answer, Plaintiff has no expectation of privacy for this information.

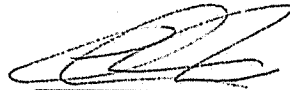
24. Were the results and findings of the investigation into the Plaintiffs actions on August 5th 2022 forwarded to the Newaygo County Prosecutors Office for possible charges under Public Act 261 of 1965 (3) which makes a violation of the Park Ordinance a misdemeanor crime. If the answer is no, who decided this action. If the answer is yes, which employee provided this to the Prosecuting Attorneys office, and which employee at the Newaygo County Prosecuting Attorneys office received it. Describe in detail the findings of any investigations by the Newaygo County Prosecuting Attorneys office.

ANSWER: Defendants object to this interrogatory to the extent that these interrogatories exceed the number permitted under FRCP 33 (including all discrete subparts) without leave of the Court, that it asks for information from individuals or entities, such as the

- White Cloud Park 6/9/21
- Sandy Beach 6/19/21
- White Cloud Park 7/8/21
- White Cloud Park 7/8/21

I DECLARE THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

Dated: 1/4/22



CHRISTOPHER WREN

I DECLARE THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.


Dated: 1-6-23



SGT. CHRISTOPHER FRERIKS

I DECLARE THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY INFORMATION, KNOWLEDGE AND BELIEF.

Dated: 1-4-23



NICHOLAS SMITH